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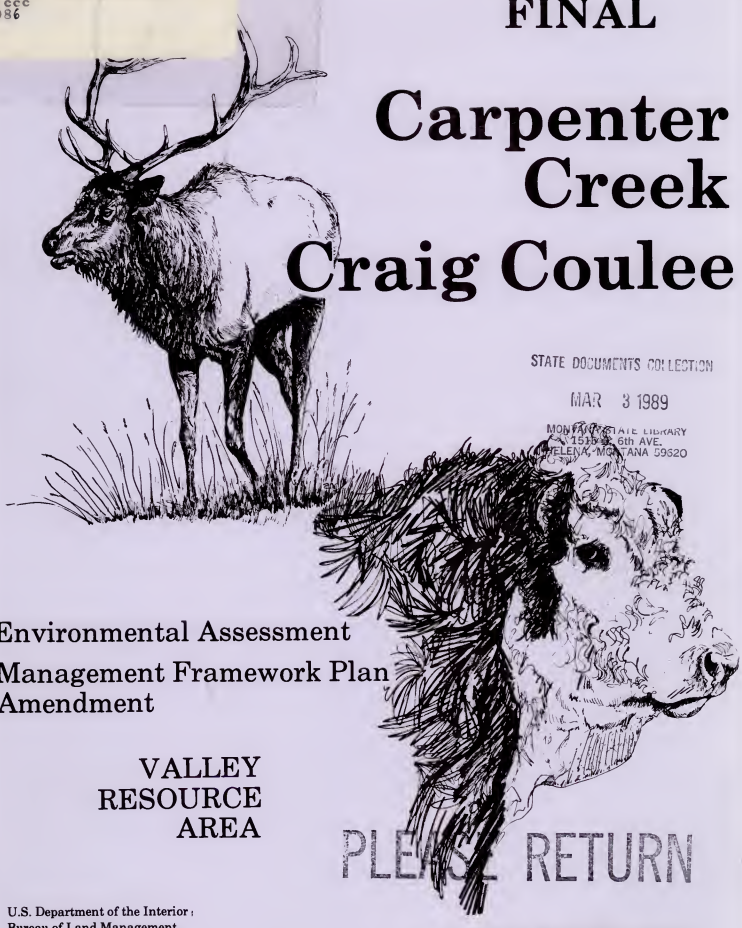
FINAL

Carpenter Creek Craig Coulee



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Environmental Assessment
Management Framework Plan Amendment

VALLEY RESOURCE AREA

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BUREAU OF LAND MANAGEMENT
LEWISTOWN DISTRICT OFFICE
80 Airport Road
Lewistown, Montana 59457-9699

Dear Reader:

Thank you for your concerned response to the draft management framework plan amendment/environmental assessment for the Carpenter Creek-Craig Coulee area of the Valley Resource Area, Lewistown District, Montana.

The enclosed material constitutes the final document and includes: the Record of Decision, errata sheet, explanation and response by BLM to the public review, letters from public reviewers of the draft document, and the detailed BLM response to the public review. Please note the specific information regarding the public appeal process given in the decision.

The Lewistown District, in cooperation with the Montana Department of Fish, Wildlife, and Parks and others will prepare a multi-resource plan and an environmental assessment (EA) of that plan for the Carpenter Creek-Craig Coulee area. This multi-resource plan is the next step in the process following the decision to amend the Valley Management Framework Plan. We will present the multi-resource plan and EA to the public for review and comment. This will permit you and other interested publics to address specific interests and concerns.

Time has elapsed since we and the cooperators began the process resulting in this decision. Some of that time was dedicated to working closely with the U.S. Fish and Wildlife Service, Charles M. Russell National Wildlife Refuge (CMR) staff. This required waiting for the completion of the CMR planning/management documents. Now that we have completed the initial reviews and planning meetings with the CMR staff, we are able to complete the BLM planning amendment and issue the attached decision. We hope this clarifies any implied delay in this effort.

We will inform you of progress on the multi-resource plan and EA as they are developed. Thank you for your participation.

Sincerely yours,

Wayne Zinne
District Manager

RECORD OF DECISION
for the
Carpenter Creek-Craig Coulee Management Framework Plan Amendment,
Valley Resource Area, Lewistown District Montana
Bureau of Land Management, March 1986

It is my decision to adopt the proposed amendment which will modify the existing MFP to permit greater flexibility in management of livestock and wildlife resources in the Carpenter Creek and Craig Coulee livestock allotments, Valley County, Montana. A "No Action" alternative was analyzed.

Finding of No Significant Impact

Based on the facts and circumstances presented in the subject Environmental Assessment, it is determined that there will be no significant impact on the quality of the human environment, and an environmental impact statement will not be prepared.

This decision will be implemented no sooner than 30 days after the publication date of this decision, and is subject to administrative review. Questions regarding this decision should be sent to the District Manager, U.S. Bureau of Land Management, Lewistown District, Airport Road, Lewistown, Montana 59457.

Recommended by: _____ Date: 3/11/86
Dennis Hoyem, Valley Resource Area Mgr.

Concurred by: _____ Date: 3/24/86
Glenn W. Freeman, District Mgr., Lewistown

Approved by: _____ Date: 9/9/86
Dean Stepanek, State Director, Montana

ERRATA SHEET

1. Correct Table of Contents "II C. 3, Alternative 3 - Preferred Alternative" to read: "Alternative 3 - Deferred Rotation."

2. Add sentence to end of first paragraph, page 1 as follows: "This document addresses only the BLM administered area and does not in any way involve the Charles M. Russell National Wildlife Refuge."

3. Correct the Alternative Comparison Summary, page 39 for Range Condition, percent of potential for Alternative 3 to read: "increase (70-80%)."

BLM RESPONSE TO WRITTEN COMMENTS ON VALLEY MFP AMENDMENT

The environmental assessment for the proposed Valley Management Framework Plan Amendment issued in December 1985 addressed a two-step management action involving the Carpenter Creek and Craig Coulee grazing allotments in southern Valley County. The first step (Part I of the document) assessed a change in the broad land use planning and the management framework plan (MFP). The second step (Part II) analyzed three grazing management systems. Two of these options could be implemented only if the MFP were revised.

It is important to understand the distinction between the MFP stage, which involves a change in the grazing season provision for the Carpenter Creek Allotment and the grazing system provision for the Craig Coulee Allotment, and the Allotment Management Plan (AMP) stage which deals with grazing management actions subsequent to the MFP. The proposed MFP amendment would require "as a minimum, growing season deferment" in the grazing formula for the two allotments. For the Carpenter Creek Allotment, the MFP provision would be removed which requires "no change will be made" (in livestock use) "unless it results in less use for the period 4/16 - 10/30", and, for the Craig Coulee Allotment, the provision requiring "year-long rest" in the "grazing formula", would also be removed.

The MFP amendment would not dictate a particular grazing system. This would be done at the subsequent activity plan or AMP stage. Specific grazing systems were analyzed in the draft document to show the range of impacts expected to occur under the new provision allowing the option of growing season deferment compared to the current MFP provisions. The proposed wording in the MFP requiring "as a minimum, growing season deferment" can only be met by instituting a planned method of scheduled grazing use to ensure each pasture would be regularly rested during the growing season. To implement such a management plan, an AMP must be developed which would include a certain amount of pasture fencing and water development. Some sort of grazing system and level of range improvements will be established with or without an MFP amendment as they are already authorized under the present MFP and Missouri Breaks Grazing EIS. The purpose of deferment during the growing season as a minimum level of management is to allow plants to restore food reserves and make seed. Deferment also allows for seedling establishment and provides for exclusive use of major portions of the allotments by wildlife at any point in time.

The BLM received 24 letters from individuals and groups in response to a request for written comments on the Valley MFP amendment proposal. Seven letters supported the proposed amendment, one was neutral, and sixteen were generally against BLMs proposal.

Those favoring the amendment generally cited their opinion that the proposal fits the concept of multiple-use and that it wouldn't conflict with recreation but would provide the operator more flexibility. Improved conditions for wildlife and livestock through grazing management were cited. The grazing operator contended that the current MFP essentially required grazing every year during the "critical growing season", and that "coulee and creek bottoms"

were receiving a disproportionate amount of use which has resulted in a "deteriorated" state. The operator also stressed that, under the proposal, wildlife would have "exclusive use" of the "majority of areas of critical wildlife habitat" at any one time. The contribution of private land to wildlife was also pointed out.

Those opposing the amendment questioned the overall objectives of the proposal. Many felt the action would benefit only the operator at the expense of wildlife. The relative allocation of forage to livestock and wildlife was questioned by several. Many expressed the opinion that the proposed changes in management, including the fences and stockwater developments, would be detrimental to wildlife by attracting cattle to currently ungrazed areas. Montana Dept. of Fish, Wildlife and Parks expressed a concern that yearling cattle conflict more with wildlife than cows/calves do. An increased elk population up to 400-450 head was sought by two sportsman. It was recognized that elk population is regulated by the "landowner tolerance factor," i.e. MDFW&Ps regulates big game populations within limits of tolerance of landowners to crop depredation. "Lure" crops were advocated by one individual. Many took issue with the high cost of the fences and stockwaters. The bowhunting groups were concerned that "subtle" livestock management practices by the current operator might be causing elk to leave the area and that the pre-1982 livestock operation and current MFP would be the best for wildlife. The "No Action" Alternative was advocated by the National Wildlife Federation. The possibility of displaced elk damaging crops of surrounding ranches was raised by the Missouri Breaks Bowhunters Association. The economic value of hunting and other outdoor recreation was stressed by several. The importance of monitoring was stressed by one individual.

Most letters not supportive of the proposed action did not make a distinction between the MFP and AMP issues. Many focused on Alternative 3 of Part II, which describes a deferred rotation grazing system. This alternative is the same as the preliminary draft AMP that has been developed with the involvement of the "working group". The working group is comprised of representatives of BLM, Montana Dept. of Fish, Wildlife and Parks, Page-Whitham Land and Cattle Co., Etchart Ranch, and Charles M. Russell National Wildlife Refuge. We want to make it clear to all that, while the deferred rotation system appears at this time to be the best choice, the MFP revision in itself would not institute which system will ultimately be used. The BLMs proposal is to amend the Valley MFP at this time, then after the amendment, select the combination of grazing system and range improvements that is most appropriate to meet our multiple-use objectives. The grazing regulations, CFR 4120.2-3(a), provide for involvement at the AMP development stage by all affected interests. We will be contacting the members of the "working group" to review the existing draft plan again and consider any changes. The public will be notified prior to implementation of the plan. An environmental analysis will also be prepared addressing any impacts not previously addressed.

State of Montana
Office of the Governor
Helena, Montana 59620

TED SCHWINDEN
GOVERNOR

January 23, 1986

Mr. John Kwaitkowski
Deputy State Director
Bureau of Land Management
222 North 32nd Street
P. O. Box 36800
Billings, Montana 59107

Dear Mr. Kwaitkowski:

The Governor's Planning Task Force has completed its review of your agency's draft Carpenter Creek/Craig Coulee Environmental Assessment (EA) Management Framework Plan (MFP) Amendment. We wish to thank you for the extension of time in which to submit our comments. The only state agency wishing to submit formal comments is the Montana Department of Fish, Wildlife and Parks. You will find a copy of their comments attached to this letter.

The Planning Task Force appreciates the chance to review the draft planning document, and submit comments to your agency. If you have any questions regarding the comments, or need additional information, please contact me.

Sincerely,

Ralph

Ralph Driear
Chairman, Planning Task Force

Attachment

RD/vb

cc: Glenn Freeman, District Manager
Bureau of Land Management
Lewistown District Office
Airport Road
Lewistown, Montana 59457-1300

3

Montana Department of Fish, Wildlife & Parks

1420 East Sixth Avenue
Helena, Montana 59620

January 20, 1986

Mr. Ralph Driear
Governor's Office
State Capitol Building
Helena, Montana 59620

Dear Ralph:

The following are our comments regarding the EA for the MFP Amendment for the Carpenter Creek and Craig Coulee Allotments.

The wildlife resources and values of the MFP area have been well documented. Hunting District #631, which is comprised primarily of the areas in question, has supported as many as 200 elk. The mesic coulees in the Square Creek Pasture provide critical summer range for elk. A total of 21 sharptailed grouse leks occur on or near the Carpenter Creek allotment and the proposed Frenchman Hills and Sheepshead pastures of the Craig Coulee allotment. The EA points out that those leks occur in a very high density with some that are less than one mile apart and that more leks are likely to be found. Finally, mule deer populations with densities of 7 to 10 per square mile occur on the area. [The Sheepshead pasture includes the major portion of a mule deer winter range which was used by over 700 deer in the winter of 1982-83.]

1

[The objectives of the proposed changes are to make more uniform and complete use of the vegetation resources on the area. To accomplish those goals, all of the alternatives depend heavily upon the construction of additional fences and stockwater facilities to force livestock to use portions of the range that were formerly lightly used.] [The only exception for any of the proposals was that the current allocation of forage would not be changed. Under that formula, livestock receives 97.3 percent of the allocated forage while wildlife receives 2.7 percent (M.F.P. WL-11, Valley WC, Wildlife).]

2

3

[A major goal of the MFP amendment is to correct vegetation problems and provide special management for areas with a potential to support woody vegetation (p. 15). Those goals will be achieved through some grazing deferral in spring which will require fence construction and stockwater development. The EA states that those range improvements are not expected to significantly affect wildlife populations. It is likely that the current distribution and

4

4 cont. abundance of wildlife on the Carpenter Creek and Craig Coulee Allotments is a direct result of the pre-1933 livestock management and distribution and that any change that results in a wider distribution of cattle or more intensive use of the range vegetation will negatively affect those populations] [We do not believe the

5 impact of the proposed range improvements on wildlife or other resources has been fully addressed.

The Montana Department of Fish, Wildlife & Parks (FWP) believes that the proposed changes in the management of the Carpenter Creek or Craig Coulee Allotments, including the additional fencing or stockwater development, will likely have adverse impacts on the resident wildlife populations, especially elk, sharptailed grouse and mule deer. These impacts will occur in a variety of ways including: reduction of residual cover and competition for food and space]

Changes in the timing of livestock grazing can affect the extent to which wildlife use an area. Knowles (1975) studying the relationships of elk, mule deer and cattle in a rest-rotation grazing system in the Missouri Breaks found that elk use was concentrated in areas not previously used by cattle especially if that use

6 occurred during early summer. The proposed alternative calls for livestock use of three of the four pastures that contain critical elk habitat either before or during the critical period. Therefore, elk use of the proposed Upper Square Creek, South Fork Willow, Frenchman Hills and Sheepshead pastures in the critical season may be less than expected.

Knowles also found that under those circumstances, mule deer were

7 exposed to heavy use of their range by other ungulates either cattle or the displaced elk. Therefore, it seems that mule deer may be doubly impacted by change in livestock grazing of critical elk range.

The preferred alternative calls for the development of 32 stock-

5 water devices. A quick review of the sketch maps included indicates that 14 of those will be placed in areas of critical seasonal importance to either elk, mule deer or sharptailed grouse. The pipeline system and associated watering facilities are to be placed in some of the better habitat in the Craig Coulee pasture. Hackie (1970) observed that 60 percent of cattle use was within one-half mile of stockwaters on his study area in the Missouri Breaks. Heavy grazing and local overgrazing occurs around some reservoirs on the EA area at the present time (p. 25). The Missouri Breaks EIS predicted that stockwater devices would be detrimental to mule deer and sharptailed grouse (pp. 3-17, 3-20 and 5-2).

Sharptailed grouse are particularly sensitive to increased grazing pressure and resultant decreases in residual cover (Nielsen and Yde 1981, Oedekoven 1985, and others). Those same authors state that sharptails do not readily move from areas of heavy grazing pressure to areas of light pressure. They also recommend that

8 care should be taken to limit the level of livestock use within one-half mile of high grouse use areas. The lek is the center of activity for sharptail populations. Given the density of grouse leks on the EA area, such a restriction would make it hard to find suitable locations for the proposed stockwaters.

The installation of range improvements may be expected to have adverse impacts on other resources as well. Localized heavy grazing and overgrazing can be expected to occur within one-half

5 mile of the newly created stockwaters. That will impact a total of about 16,000 acres in the EA area. Accelerated erosion can be expected to occur on those same areas (MRB's EIS p. 2-12). Yet, there is no evidence given to show that localized overgrazing already occurring around existing stockwaters and springs would be reduced.

The impact of yearling cattle on wildlife resources is not addressed. Prior to 1983, the Carpenter Creek and Craig Coulee allotments were stocked with cow-calf pairs. After 1983, about one-third of the

9 AUM's have been used by yearling cattle. Yearling cattle are required to graze further from water and travel around a pasture more than cow-calf pairs. Simply switching from cows to yearlings impacts wildlife by increasing the level of social interaction and decreasing the amount of residual cover due to increased consumption and mechanical damage.

Finally, there are a few corrections that need to be made in the table on page 39 that compares the effects of the various alter-

10 natives. Range condition is expected to increase under the preferred alternative, yet the percentage range given is the same as the existing situation. The cost-benefit ratio shown for the preferred alternative is different from that given on page 10 of the EA, 1.1/1 compared to 0.9-1.1/1.

In summary, our review of the existing wildlife populations, the

11 fact that 80-97 percent of the allotments are in good to excellent condition, and the potential impacts of the proposed grazing facilities and management changes lead us to the conclusion that no changes should be made in the way these allotments are presently being managed.

Thank you for the opportunity to comment.

Sincerely,

B.k.

Robert R. Martinka
Resource Assessment

Telephone 406-367-5235

PAGE-WHITHAM

LAND & CATTLE

Tampico Route - Glasgow, MT 59230

January 20, 1986

Mr. Dennis Hoyum
Area Manager
Valley Resource Area
Bureau of Land Management
Glasgow, Montana 59230

Dear Dennis:

We are taking this opportunity to make a few comments in regards to your recent Draft Management Framework Plan amendment for the Carpenter Creek/Craig Coulee allotments.

First, I would like to compliment you and your staff on the effort you made to compile a complete and comprehensive assessment.

As is pointed out in the Draft amendment, I feel confident that with a cooperatively formulated management plan, we can better manage the affected allotments to meet the needs of the resource area under the multiple use concept.

12 Obviously, there has been and remains to be concerns of potential conflict between livestock grazing and wildlife values. It is my opinion, however, that most claims of potential conflict are based on conjecture and not on a good understanding of proposed livestock management and the benefits to wildlife values under a system of scheduled and intensively controlled movements of cattle.

13 I feel it should be further pointed out that the majority of areas of critical wildlife habitat within the Craig Coulee/Carpenter Creek allotments will be void of livestock at any one time and will be available to wildlife exclusively.

14 It is also important to understand that under the present Management Framework guidelines, there is much left to be desired from the standpoint of forage management. As a matter of fact, the management and season of use on a continued basis within the upper portion of the Carpenter Creek allotment and the lower portion of the Craig Coulee allotment is in complete conflict with modern range management technology. It must be realized that these locations are presently being grazed with large numbers of livestock year after year, during the critical growing

season, of most all desirable plants in the area. Most all of the coulee and creek bottoms have been virtually "grubbed" out each spring and early summer for many years
14 and are presently in a condition of deterioration.
cont. Conversely, the uplands are hardly used and are deteriorating as the result of lack of grazing. These conditions do in fact exist and have been verified by a number of qualified range specialists.

12 A good deferred or rest rotation grazing system should go a long ways to improving these conditions and will be beneficial to both livestock and wildlife values.

15 I might also add that all of the high quality wildlife habitat on private lands within the allotment must be given credit and it should also be recognized that cultural practices contribute greatly to the existence of large populations of numerous wildlife species.

It should also be understood that it is the desire of Page-Whitham and Etchart Ranch to work cooperatively with the BLM and other agencies, along with sportsmen to maintain high quality wildlife values and a well balanced eco-system within the allotment.

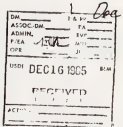
With these thoughts in mind, I encourage the BLM to adopt the proposed MFP amendment to not only allow for more flexible grazing management, but to also improve other resource values under the multiple use concept.

Sincerely,

STEVEN R. PAGE

Dec 12-1985

Glenn A. Freeman
District Manager
BLM Office
Lewistown, MT



Dec 12-1985

Dear Sirs:

This is my comments on the Environmental Assessment of the Carpenter creek, crail coulee allotments, dated Dec. 1985.

This area of Valley County and eastern Montana represents a unique value to all sportsmen and the general public. The elk in this area are part of the nationally famous Judith River Breaks Elk Herd. As stated in your assessment they are the only known free roaming elk herds that exist naturally in a rolling plains/river breaks habitat. The elk that live in the carpenter creek, crail coulee allotments are some of the eastern most free roaming elk herds in the United States. The sharptail Grouse populations that inhabit this area comes from the highest density of sharptail grouse dancing grounds in the United States, (as quoted from Charles Pregler, former BLM wildlife Biologist, Glasgow office). As you can see this area really has some high wildlife values and should be well taken care of.

16 [On Page A-8, Appendix 6, Investment analysis, "present value of benefits", recreations value of the area is rated as zero "0", I don't believe the BLM
17 has such a low rating for recreation-wildlife.] [Multiple Use is not only a
18 new trend but a federal law.] [On page 39, Alternative comparison summary, In
19 not one alternative does wildlife show any improvement.] [Increase the operator shows a great deal of improvement, "Utilization" increase 65-75%] live-
stock management opportunities improve greatly, calf weights improve mod-
erately, ranch management opportunities improve greatly.] The additional
20 stockponds, new reservoirs, fences being considered will do nothing to help
wildlife, this is just a way to graze off more of the grass (utilization
increase 65-75%) This is not acceptable for the sportsman who use the area.
21 The new fences in this area already have had serious effect on the Elk Herd,
(Montana Fish wildlife & Parks information)]

I am not against the operator improving his ranch, it would only seem natural to do so. But not at the expense of the United States Taxpayer.

Using Multiple Use as a guide-line the wildlife in this area could be en-
22 hanced very easily. [The pre 1982 grazing operation should be re-adopted.]
23 [This would bring back the sharptail grouse populations to pre 1982 status.]

24 The Elk Herd that uses this area often, with the shorter summer range in south Valley County, should be increased from an average population of 312 to an average of 400-450 wintering head. As stated in the environmental assessment the Elk populations are regulated by landowner tolerance of crop depredation. More crops could be utilized at various locations to eliminate any further depredations by even less than now

My final comment is, I recommend the carpenter creek crail coulee allotments be reverted back to its 1982 status and that more crops be planted at key locations to eliminate any crop depredations and that the Elk Herd be increased to 400-450 wintering head. This increase would be well received by local and statewide sportsmen as well as the general public. This would be far less costly to the US taxpayer also, thats not a bad idea these days.

Thank you

Steve Schindler

Steve Schindler
Glasgow, Montana

Dear Sir:

I would like to make a comment concerning the Carpenter Creek Grazing Coulee, M.S.P. dated Dec. 1985.

After reading the seven alternatives mentioned I think the Bureau of Land Management should change its name to the Bureau of Livestock Management. The first six alternatives do nothing for the area's wildlife, $300,000.00 worth of stock dams, water tanks, and fences will promote more grazing in the only areas left for Sharptail Grouse, Mule Deer and the Elk. With the cattle being spread out more there will be more and more cattle - Elk confrontations. Wildlife will leave areas where cattle in large amounts graze, (documentation from Mont. Fish, Wildlife and Parks). The final result being less wildlife. To me this is not acceptable,

25

I think alternative #7, page 16 mentioned, but not analyzed for some political reason, is the only way this allotment should be managed.

26

The A.U.M.'s should be reduced in this area. With more and more intensive grazing programs being introduced in a semi-arid area this can promote further destruction of public land.

26 cont.

How much more can we, the taxpayer, be raped of our public land?

Afterall, the $1.35 per A.U.M. will not cover the expense of 36 miles of fence, 37 new reservoirs, 9 stock trails, 1 well and pipeline and 4 cattle gates, this is not multiple use.

27

Alternative #7, recalculation of forage, reduction of A.U.M.'s will promote a better range land and increase both wildlife and grass for a reduced cattle herd.

26

Why should we, the taxpayer, sportsmen, recreationist support the ranchers who abuse public land at our expense. It seems funny that ranchers who own their own land are making a living and a ranch that is 89% public land connect. Over production is what is wrong with the livestock industry, (cattle prices), lets not destroy anymore public land!

Thank-you

Rudy Hicks

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Charles M. Russell National Wildlife Refuge
P. O. Box 110
Lewistown, Montana 59457
December 20, 1985

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Glenn Freeman
Lewistown District Manager
Airport Road
Lewistown, MT 59457

Dear Glenn:

Thank you for the opportunity to review and comment on the draft Carpenter Creek Craig Coulee Environmental Assessment and Management Framework Plan Amendment.

28 Although the document does not specifically include the Charles M. Russell National Wildlife Refuge, it implies that refuge lands will be managed as the plan indicates. There is no statement that prohibits the reader from making this assumption. A statement excluding the CMR NWR is needed to clarify this point.

As you are aware, the Record of Decision on the refuge Environmental Impact Statement should be released in January of 1986. Sometime after that the refuge will prepare a habitat management plan for our portion of the Timber Creek (Plum Creek on BLM) and Harper's Ridge pastures to achieve our wildlife objectives. We hope to achieve our wildlife objectives with the least amount of disruption to the grazing permittee and the BLM.

Thank you again, and if I can be of further assistance, please contact me.

Sincerely,

Ralph F. Fries

Ralph F. Fries
Refuge Manager

cc: Fort Peck
BLM, Glasgow

8

Return to P/CA

Glenn W. Freeman
Dewistown District Manager
Airport Road
Dewistown, Mt.

Dear Mr. Freeman

I believe the Carpenter Creek Craig Coulee Management Framework Plan Amendment be rejected in it's entirety. My number one concern here is wildlife. The proposed amendment, contrary to your plan, does nothing to enhance wildlife in this critical area.

29 This area is to be managed for mutiple use, not primarily to accomodate the lease holder. The abundant type and number of wildlife in the affected area is proof enough to substantiate my case, for no change of the existing 1982 MFP. If "has" worked.

6

30 At the current time we know that the Carpenter Creek and Craig Coulee allotments are most critical to elk and sharptail grouse production. Some subtle changes by lease holder have already taken place in this allotment to the detriment of elk. Winter surveys in 1983 and 1984, have shown a change in winter distribution of elk. The Montana Department of Fish, Wildlife, and Parks has indicated that at least half of this loss is directly related to these changes. If this subtle impact has already disturbed these elk in a negative manner, the proposed MFP would be nothing short of a disaster, not just for elk but all wildlife concerned.

31 In your proposed MFP there are from 25 to 36 water improvements and miles of new fence. I believe this alone will distribute livestock in a more diverse manner for intense grazing of areas which have been exclusively used by wildlife. This again will be to the detriment of all species. With this increased livestock use of mesic coulees, elk seeking summer forage, will become a real damage threat to surrounding ranchers.

32 With the decrease in vegatation , which was formally used by wildlife, so will go one of the highest densities of sharptail grouse leks in the state. This may be the last strong hold in the county as numbers in surrounding areas continue to decline.

33 What about sage grouse and antelope? They too will be impacted.

34 This allotment is very popular not only with resident hunters, but sportsmen from all over the country. At the present time there is a great demand for the resource than is available. We cannot accept a decline. The proposed MFP will have a direct economic impact on our community. Wildlife has, and will continue to have great economic value to all of us. With the advent of pay hunting in the West, more and more hunters will head to

35 Eastern Montana to hunt on our vast acreage of public lands. They will bring many dollars to be spent in this community. Those who help protect the resource will receive a great return of dollars for their community, not to mention, a quality hunt or photo session not far from their back door.

We all have felt the money crunch in the past few years. Our taxes and the national defecit continue to rise. A question has to be asked, "Who will pay the tab for the proposed improve-

36 ments"? The BLM received $244,110 in receipts on all leases in the state for 1985. With that kind of receipts, the BLM is going to have a problem. I don't want to have to foot your bills and I'm sure many of my farmer-rancher friends, who have had such a tough go of it in the past few years would agree.

Sincerely yours

Richard T. Traeger

Richard T. Traeger
Pres. MHAA

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January 13, 1986

Frank R. Thompson, M.D., P.C.
Raymond M. Stalmaster, M.D., P.C.
Steven P. Berberet, M.D.

Suite 610
Montana Building
Lewistown, MT 59457
(406) 538-7791

Mr. Glen Freeman
District Manager
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Dear Mr. Freeman:

It has come to my attention that BLM is anticipating developing more land north of the Missouri River and the Missouri River Brakes for livestock production. Cost analysis of that project presented to me by Mr. Buddy Lundstrom seemed to make this objectionable in that you are simply spending tax payer money for increased live- 37 stock production. When it is my understanding the general trend of progress around the CMR is to decrease the amount 38 of livestock usage in order to increase its caring capacity for wildlife.

For what it is worth, I am opposed to the BLM proceeding 39 with this project in South Valley County for Page-Whittam. The purpose of this letter is simply to make my feelings known.

Best regards,

R. M. STALMASTER, M.D.

RMS/jag

10

Professional Bowhunters Society

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P.B.S. Magazine Editor/Advertising
JACK SMITH
P.O. Box 3273
Charlotte, NC 28225
1-704-536-0009

Councilmen
DAVE SAMUEL
Rt. 6, 16 Orchard Acres
Morgantown, WV 26505
1-304-594-3082

FRED RICHTER, JR.
86 Orchard Lane
Wheeling, WV 26003
1-304-242-9727

GENE WENSEL
P.O. Box 82
Hamilton, MT 59840
1-406-363-5090

Librarian
DON CADY
State Rt. 209 S.
Cambridge, OH 43725
1-614-439-4170

Mr. Glenn W. Freeman
Lewistown District Manager, BLM
Airport Road,
Lewistown, Montana, 59457

Dear Mr. Freeman,

Our association of over 1600 sportsmen nationwide would like to add our comments regarding the draft Environmental Assessment on Carpenter Creek, Craig Coulee in the Valley Resource Area, Lewistown District, Mt.

We feel that the Carpenter Creek/Craig Coulee area is a unique environment for a unique resource, the free-roaming Missori Breaks Elk herd. We feel that this resource should be given the utmost consideration in your decisions and management plans for this area. We strongly advocate the multiple use concept of management for this area, and draw your attention to the fact that this elk herd accounts for thousands of recreation hours for bowhunters, not only from Montana but from across the United States. We feel that the recreational use of these lands be given a high priority in your decisions, as these uses benefit many citizens, not just a limited few who may be grazing livestock.

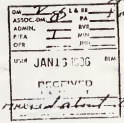
In addition to the elk, other species such as the sharptail grouse add to the wildlife value of this area, further suggesting that these wildlife values be given priority consideration in management of the Carpenter Creek/Craig Coulee resources.

Additional fencing, water reservoirs, and most of all increased grazing 40 are detramental to the habitat and environment critical to the free-roaming elk herds and other wildlife species. Instead, we would like to see this 41 area managed for an increase in the elk population. A decrease in the grazing by livestock, and thus an inhancement in the recreational value 42 of this already valuable area.

Not only should the multiple use concept of management of Federal lands be adhered to in the Carpenter Creek/Craig Coulee area, but also the recreation value to sportsmen should be recognized and given a priority use because of the fact that the recreation values benefit many more people, all of which should have an equal right of use of their public lands in America.

Respectively submitted,

Doug Borland
Vice President



Lyon E. Boyd Jr.
Gunnison, Colorado
5755 4-H

Dear Sir:

My attention has been called to the proposed

43| alternatives in [Region 4 & 7]

44| It is understood the proposal right, the works to be done will benefit only one or two landowners which is not right.

If makes to much of confinment area for cattle which will damage valuable wildlife resource.

45| I feel proposed cost of this product to me to be very high

yours Truly
conservationist landowners
and sportsman
Lyon E. Boyd Jr

C/o Glen Fiegen

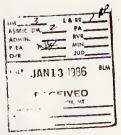
As A avid Sportsman I have Read the proposal By Boge which is on the grassy Basin Too Bottoms of Black Canyon Parking the B.L.M. land

I would like To go on Record that I am very much opposed to any [illegible] grazing permits into this Areas. For I Believe it will affect Elk, Deer of Birds in these areas that they Have Too Many Cattle the Areas

46

47

Gunnison
Brandy Cook
Box 301
Gunnison, Colo. 81230



Emitt D. Northup
Rte. 1 - 4255
Glasgow, MT 59230

January 8, 1986

Bureau of Land Management
Lewistown District Office
Airport Road
Lewistown, MT 59457-1300

Dear Sirs:

Thank you for allowing me this opportunity to comment on the Carpenter Creek, Craig Coulee MFP amendment.

I am no longer an officer of the Missouri Breaks Archery Association, therefore the following comments are strictly my own.

Concerning specific parts of the document:

48 PAGE 6 - under "Multiple-Use Recommendation" paragraph (1); I believe the stated total number of elk (250) is unrealistically low and am convinced through my own observation and from conversations with MT. State F.W. & P. personnel that 400 head is a reasonable figure.

49 PAGE 8 - paragraph "D", second sentence; "One goal of the MFP is to maintain or improve elk habitat. The proposed livestock operation could be in conflict with this goal and the technical requirements of the MFP." Let us put the emphasis on "IMPROVE" in this statement and word the MFP so there is no conflict.

50 PAGE 10- section "A" Proposed action, paragraph 3; I concur that because of better pasture utilization calf weights could be higher, but I question that conception rates would be higher simply because of the wider dispersion of animals. It seems to me that the opposite would be true.

51 PAGE 16- section "C", paragraph 2; "Specific objectives developed in compliance with the MFP in the allotment management plans would be monitored. If these objectives were not met, a change in the grazing system could be implemented to correct any deficiencies in the plan." I believe this to be the most important paragraph in the whole statement for this allows the managing agency to correct any

51 PAGE 16- (continued) problems which might occur, as they occur, so that minimum damage to the resource will be incurred.

48 PAGE 28- section "I", paragraph 3; Past history seems to concur with my belief that the resource is fully capable of supporting 400 head of elk in this area.

52 PAGE 29- paragraph 2; While the elk situation is unique in this area, the maintenance and improvement of grouse habitat is critical for their survival. Elk will move to better pastures without hesitation, but research indicates conclusively that grouse do not. They simply die out. Therefore, great concern must be given to their welfare. Sentence 3 of the first paragraph of section 6 on page 35 bears this out.

53 PAGE 36- section 2, paragraph 1, sentence 4; the "custodial permit" refered to would require close monitoring on the managing agencies' part to insure safety of the resource.

54 PAGE 39- "Range Condition" under Alt. 3 column; 65% - 75% is not an increase as the existing is 65% - 75%. Also on this summary, I think a line for livestock stocking figures under each alternative should have been included for comparison reasons.

Given the above noted changes and incorporating my concerns, I would then favor Alternative 3 as the best of those presented.

Sincerely,

Emitt D. Northup

Emitt D. Northup

June 12, 1986

Dear Mr Freeman,

I'm writing in protest of the proposed alternative #3 by the Page-Whittam company which leases a good portion of B.L.M. land in south Valley county bordering the A.N.R.

The total cost determined by the BLM would be $36,875.00. This cost can not be recovered by increased grazing fees.

55

The plan would only benefit the lessee at the page (my) expense.

56

Sincerely

Stan Colmer
Heath Star Rt B Box 5490
Lewistown, Montana
59457

DM
ASSOC. DM
ADMIN.
P. EA
OPS
L & RE
PA
RYA
MIN
JUD
USGR JAN14 1986 BLM
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LEWISTOWN, MT
ACTION

13

DM
ASSOC. DM
ADMIN.
P. EA
OPS
L & RE
PA
RYA
MIN
JUD
USGR JAN15 1986 BLM
RECEIVED

Frank R. Thompson, M.D., P.C.
Raymond M. Stalmaster, M.D., P.C.
Steven P. Berberet, M.D.

Suite 610
Montana Building
Lewistown, MT 59457
(406) 538-7791

January 13, 1986

Mr. Glen Freeman
District Manager
Bureau of Land Management
Airport Road
Lewistown, Montana 59457

Dear Mr. Freeman:

I am writing to object to Alternative Number Three for use of BLM land presently leased by Page-Whittam in Valley County. This includes developing additional reservoirs, water tanks, and more fence. With the depressed cattle market, this would not be a good investment and takes unfair advantage of other cattle producers who do not have BLM land use.

57

Sincerely,

STEVEN P. BERBERET, M.D.

SPB/jag

Speed Message

To Glen Freeman
c/o BIM office
Lewistown mt

Jack Spicer
1203 5th Ave So
Lewistown mt 59457

Subject BIM Land Barter

RECEIVED
JAN 15 1986
BUREAU OF LAND MANAGEMENT

DH L & S
ASSOC. DH PA
ADMIN. EVS
P. LA. PLN
OPS AUD
ACTION DATE

1-11- 19 86

Glen

In Regards To the South Valley County grazing district, I do not think We Should Spend Any Money To help The Page-Whitman][To Extend Grazing on Our public Land + cut Bird + Game Animals out of Natural habitat Fencing would change habitat + migrating Elk herds Also From one Area To Another. Cattle around resivars Would wreck Sage Grouse + Sharptail Mateing or Drumming grounds. Please remember I'm Not For this Project At All]

58

59

Thanks

Signed Jack Spicer

WilsonJones

NATIONAL WILDLIFE FEDERATION

Northern Rockies Natural Resource Center
240 N. Higgins, Missoula, Montana 59801

RECEIVED
JAN 21 1986
BLM
LEWISTOWN, MT

January 16, 1986

Glen Freeman, District Manager
Valley Resource Area
Bureau of Land Management
Airport Road
Lewistown, MT 59457-1300

RE: Carpenter Creek Environmental Assessment

Dear Mr. Freeman:

The National Wildlife Federation has reviewed the Carpenter Creek/Craig Coulee Environmental Assessment. As a preliminary matter, it must be noted that the EA is extremely difficult to follow and provides a poor picture of the potential problems associated with the preferred alternative. Nonetheless, it is our opinion and concern that the preferred alternative is unecceptable from a wildlife perspective and that the no action alternative best meets the BLM's multiple use responsibilities.

In addition to the shortcomings of the EA, we must question whether the underlying planning document relied upon by the Bureau, the Valley Resource Area Management Framework Plan, is a legally valid plan upon which to base resource management decisions. A recent court decision has invalidated BLM decisions based on MFP's because sufficient time has elapsed since the passage of the Federal Land Policy and Management Act to require that the Bureau make decisions only where a Resource Management Plan has been completed. This has not occurred in the Valley Resource Area.

The Carpenter Creek/Craig Coulee allotment currently provides some of the best wildlife habitat in Valley County, and is described in the EA as unique due to the number of spring-filled coulee heads and the associated woody riparian areas. EA, p. 14. This high quality habitat produces excellent populations of elk and sharp-tailed grouse, and the area is popular with hunters.

Rather than maintain this excellent situation for wildlife, the EA proposes heavier livestock use and an extended grazing season. EA, p. 20-22. Under the preferred alternative, extensive range improvements are proposed in order to mitigate the impacts of this increased grazing. By installing water developments and new fences, the EA proposes to spread cattle use out over the entire allotment.

While it can be argued that these range improvements may allow habitat to improve around existing water areas, even this proposition is doubtful. More importantly, however, the addition of new water developments will cause habitat deterioration in areas of the allotment which currently receive little grazing pressure. As a recently completed report on the Charles M. Russell National Wildlife Refuge stated:

> Diversity and edge effect are very important for maintaining high wildlife numbers and a variety of wildlife species; livestock grazing that is heavy near water and light or absent at a distance creates diversity of habitat and edge effect. We realize that heavy or light grazing of the same area, year after year, may cause a decline in range condition in some cases as measured by SCS criteria. However, that seems to be the only feasible way to create and maintain habitat diversity, and thus wildlife diversity at the present time. Thus, more water developments on CMR will generally deteriorate, not improve wildlife habitat...

Report on the Charles M. Russell Wildlife Refuge Draft EIS, June, 1985, p. 4. This study was authored by representatives of the BLM, and Forest Service and the U.S. Fish and Wildlife Service.

As an example of this problem, the preferred alternative calls for the construction of 10 reservoirs in the Frenchman Hills-Upper Square Creek area. EA, p. A-21. This section of the allotment contains some of the best elk and sharp-tail habitat found on the two allotments. The heavier livestock use that will occur as a result of the water developments will not only lead to the direct deterioration of wildlife habitat in this portion of the allotment, but elk use can be expected to decline as a result of competition for space with cattle. Lonner, T.N and Mackie, R.J., 1984, The nature of competition between big game and livestock.

Carpenter Creek and Craig Coulee already receive heavy cattle use. According to the Management Framework Plan livestock receive 97.3 percent of the available forage while just 2.7 percent is reserved for wildlife. Given these allocations, it must be recognized that the high populations of wildlife which currently exist on the allotment are the result of cattle use being localized by the locations of reservoirs and stock ponds. Because most cattle use occurs within one half mile of water developments, much of the allotment is relatively undisturbed by livestock and is thus available to wildlife. Mackie R.J. (1970).

The Preferred Alternative also proposes to expand the length of the grazing season. While a deferred rotation grazing system is employed, the Montana Department of Fish Wildlife and Parks has

67 cont. indicated that cattle will be on three of the four pastures important to elk during the critical spring and early summer period. 68 The Department is also concerned that elk displaced from these areas may seriously impact mule deer.

69 None of these potential impacts are in anyway discussed or identified in the environmental assessment. As a decision-making document, the EA is clearly inadequate because it does not identify or quantify the wildlife impacts that will likely occur. Instead, such information is ignored to the detriment of both the public and the wildlife resource.

70 In sum, it is difficult to believe that some of the finest wildlife habitat in Valley County can be improved by additional grazing. 71 The proposed alternative and amendment to the MFP may benefit the landowner applying for the change, but wildlife values can only be expected to decline.

The problems associated with the preferred alternative are compounded by the Bureau's reliance on the Valley MFP as the underlying planning document. While sacrificing one of Valley County's best wildlife areas might be justifiable if other wildlife lands were being improved, it is impossible to know this from the information presented in the EA and associated MFP amendments.

62 More fundamentally, the BLM cannot amend the Valley MFP. Rather, any changes in land use must come through the adoption of a Resource Management Plan developed pursuant to the Federal Land Policy and Management Act. 43 U.S.C. 1701 et seq. On Dec. 4, 1985, the Federal District Court of the District of Columbia held that the BLM could not rely on Management Framework Plans indefinitely and that Congress expected MFP's to replaced by RMP's. National Wildlife Federation v. Robert F. Burford, D.D.C., Dec. 4, 1985, at 15-16. The piecemeal modification of existing MFP's cannot stand as a substitute for the comprehensive planning demanded by FLPMA.

61 In conclusion, the National Wildlife Federation believes that the no action alternative provides the best course of action for wildlife, and that the EA does not adequately detail potential impacts which will occur if the preferred alternative is adopted. Furthermore, no change in the management status of the Carpenter Creek/Craig Coulee allotments can occur until a Resource Management Plan is prepared and adopted.

Very truly yours,

Thomas France, Esq.

cc: Charles Griffith

16

Montana Bowhunters Association
Buddy Lundstrom, Vice President
Box 1119
Malta, Montana 59538

DM — L & SS —
ASSOC DIR — FA —
ADMIN — BY —
P EA — MTS —
OPS — JUD —

USDE JAN 21 1986 BLM

RECEIVED

Glen W. Freeman
District Manager
BLM office
Lewistown Mt.

Telephone Shop (406) 654-2431 8:00 to 5:00 p.m
Home Phone 654-2167 — After 5:00 p.m.

Dear Sirs,

I would like to express the opinions of the Montana Bowhunter Association concerning the Carpenter Creek, Craig Coulee environmental assessment dated December 1985.

After reading the report over and disscusing it with several individuals we have decided to oppose this plan.

72 One of the main reasons for our opposition is the disregard for the multiple us concept. You are proposing spending thousands of dollars to enhance the land for livestock but at the same time you would be severly damaging critical wildlife habitat.

73 If you look at a the data provided by the Dept. of Fish Wildlife and Parks you can see that the leasee in this area has already done damage to the elk herd, In 1981 there were 227 elk in district 631 this has been reduced to 59 in 1985. This has happened even though there has been a reduction of permits issued for hunting elk in this area.

74 If this leasee had to spend that kind of money to improve his own land there is no way he would do it. If you look at this from an economic viewpoint there is no way that with this kind of an investment that the money earned by these improvements would even pay the intrest on the open market. Why should the taxpayers have to foot the bill? The only person who stands to gain with this proposal is the leasee. If there was also going to be an improvment in the recreational aspect I could almost go along with this but even then I would have to consider the wanton waste of taxpayer money.

As a bowhunter and a taxpayer I hope that you will reconsider before implementing this proposal.

Sincerely,

Buddy Lundstrom
V.P. Montana Bowhunters

17

OUR OWN

PARKS HOME CENTER
P.O. Box 217 - Harlem, Montana 59526
Phone: (406) 353-2221

DM — L & SS —
ASSOC DIR — FA —
ADMIN — BY —
P EA — MTS —
OPS — JUD —

USDE JAN 17 1986 BLM

RECEIVED
LEWISTOWN, MT

ACTION —

Glen Freeman

75 A wildlife refuge is set aside for the benefite of the wildlife, not to enhance the cattle grazing.

76 I oppose the proposed spending of money for livestock production, and ask you to reconsider Page-Whittman proposal on grazing.

HOUSEWARES AND GIFTS • HARDWARE • LAWN AND GARDEN SUPPLIES • SPORTING GOODS • TOOLS • PAINTS • PLUMBING • ELECTRIC APPLIANCES

VITTMAYER GRAZING ASSOCIATI
P. O. BOX 1164
GLASGOW, MONTANA 59230

SILVER DOLLAR GRAZING ASSOCIATION
Box 1163
Glasgow, Montana 59230

January 21, 1986

Mr. Dennis Hoyem
Area Manager, BLM
Site 1-775
Glasgow, MT 59230

Dear Dennis:

The grazing associations would like to add our input in regard to the Draft Management Framework Plan Amendment of the Carpenter Creek and Craig Coulee allotments.

77 As individual ranching units who have used a management plan for years, we have seen many benefits. Not only in livestock weight gains, but in the number of wildlife that have increased largely due to this management plan. Any improvement that benefits man and animal will have positive effects that out weigh the negative.

We would like to add our support of this amendment.

Sincerely yours,

Kim Snkerud

Kim Snkerud
Secretary

RECEIVED
VALLEY RESOURCE AREA NOTES
BUREAU OF LAND MANAGEMENT
JAN 23 '86
Glasgow, MT
Action (A) Info. ( )
Petitum X/ Init.
Area Mgr. ____ ____
R. Con. Sup. ____ ____
Range Con. ____ ____
Range Con. ____ ____
Range Con. ____ ____
Range Tech. ____ ____
Wildlife Bio. ____ ____
Engr. Tech. ____ ____
Secretary ____ ____
Clerk-Typist ____ ____

HINSDALE LIVESTOCK COMPANY
BOX 429, GLASGOW, MONTANA 59230
Gene Eichart — Joe Eichart — John Eichart

1-21-86

Mr. Dennis Hoyam, Area Mgr
BLM- Glasgow, Montana.

Dear Sir:

This letter will advise you of the fact that I feel you should amend the Valley County Management Plan to allow the changes sought by the operator in the Carpenter Creek Allotment.

78 These changes will allow the operator to adopt some different grazing techniques which will benefit all the use resources in the area.

Sincerely,

RECEIVED
VALLEY RESOURCE AREA NOTES
BUREAU OF LAND MANAGEMENT
JAN 23 '86
Glasgow, MT
Action (A) Info. ( )
Petitum X/ Init.
Area Mgr. ____ ____
R. Con. Sup. ____ ____
Range Con. ____ ____
Range Con. ____ ____
Range Con. ____ ____
Range Tech. ____ ____
Wildlife Bio. ____ ____
Engr. Tech. ____ ____
Secretary ____ ____
Clerk-Typist ____ ____

FOR
HEALTH'S SAKE
EAT MORE BEEF

BADLAND CO-OP STATE GRAZING DISTRICT
Post Office Box 412
GLASGOW, MONTANA 59230

January 21, 1986

Mr. Dennis Hoyem
Area Manager, BLM
Rte. 1-775
Glasgow, MT 59230

Dear Mr. Hoyem:

In reply to the Draft Management Framework Plan Amendment dated December, 1985, we are advising you of our support to your proposal.

79 The amendment proposal appears to be consistant with multiple use principles and will allow the livestock operator needed flexibility and will not be in conflict with other values.

We request you expedite the amendment to meet the immediate needs of the permittee.

Sincerely yours,

Jim McIntyre

Jim McIntyre
President

RECEIVED
VALLEY RESOURCE AREA MGTRS
BUREAU OF LAND MANAGEMENT
JAN 24 '86
Glasgow, MT

Action (X)	Info. ( )
Position	X/ Init/
Area Mgr.	
R. Con. Sup.	
Range Con.	
Range Con.	
Range Con.	
Range Tech.	
Wildlife Bio.	
Engr. Tech.	
Secretary	
Clerk-Typist	

Mitch Etchart
Box C
Glasgow, MT 59230

January 21, 1986

Mr. Dennis Hoyem
Area Manager, BLM
Rte. 1-775
Glasgow, MT 59230

Dear Dennis:

Etchart Ranch has operated livestock in south Valley County since 1912.
80 We have co-operated with the BLM and other agencies in the multiple use of the leased lands. We leased the operation to Page-Whitham Livestock Co. a few years ago. Their needs require some changes from our use, thus they requested a change in the present management.

We support the Draft Management Framework Plan Amendment as a viable solution to allow Page-Whitham the flexibility of management for their cattle operation.

Sincerely yours,

Mitch Etchart

Mitch Etchart

RECEIVED
VALLEY RESOURCE AREA MGTRS
BUREAU OF LAND MANAGEMENT
JAN 24 '86
Glasgow, MT

Action (X)	Info. ( )
Position	X/ Init/
Area Mgr.	
R. Con. Sup.	
Range Con.	
Range Con.	
Range Con.	
Range Tech.	
Wildlife Bio.	
Engr. Tech.	
Secretary	
Clerk-Typist	

C. D. Markle
1104 Valley View
Glasgow, MT 59230

January21, 1986

Mr. Dennis Hoyen
Area Manager, BLM
Rte. 1-775
Glasgow, MT 59230

Dear Mr. Hoyen:

This letter is in regard to the Draft Management Framework Plan Amendment dated December, 1985.

20
81 I am in support of this management change of the Etchart Ranch, now leased by Page-Whitham Livestock Co., A more efficiently managed ranch will have many benefits. Not only will the rancher benefit, but the public will thru the multiple use aspect.

I support this amendment.

Sincerely yours,

C. D. Markle

RECEIVED
VALLEY RESOURCE AREA MGTRS
BUREAU OF LAND MANAGEMENT

JAN 28 '86

Glasgow, MT

Action (X)	Info. ( )
Position	X/ Init.
Area Mgr.	
R. Com. Sup.	
Range Con.	
Range Con.	
Range Con.	
Range Tech.	
Wildlife Ble.	
Engr. Tech.	
Secretary	
Clerk-Typist	

Don Fast
North Star Route
Glasgow, MT 59230

January 20, 1986

Mr. Dennis Hoyen
Area Manager, BLM
Glasgow, MT 59230

Dear Dennis:

82 In reply to the Draft Management Framework Plan Amendment dated December, 1985, I am advising you of my support to your proposal.

As an interested sportsman who has enjoyed the hospitality of the Etchart Ranch for many years, I feel the proposed plan will not cause conflict between livestock grazing and recreation.

I ask that this amendment be implemented.

Sincerely yours,

Don Fast

Don Fast

RECEIVED
VALLEY RESOURCE AREA MGTRS
BUREAU OF LAND MANAGEMENT

JAN 31 '86

Glasgow, MT

Action (X)	Info. ( )
Position	X/ Init.
Area Mgr.	
R. Com. Sup.	
Range Con.	
Range Con.	
Range Con.	
Range Tech.	
Wildlife Ble.	
Engr. Tech.	
Secretary	
Clerk-Typist	

R 2 - 11 - 24
IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
LEWISTOWN DISTRICT OFFICE
Airport Road
Lewistown, Montana 59457-1300

DM ___ LA ___
ASSOC DM ___ PA ___
ADMIN. ___ AVO ___
F EA ___ MIN ___
OPR ___ JUD ___

USGS FEB07 1986 BLM

RECEIVED
LEWISTOWN, MT

ACTION ___

Dear Reader:

This draft Management Framework Plan (MFP) Amendment/Environmental Assessment for the Carpenter Creek Area in the Valley Resource Area is presented for your review and comment. This document outlines the proposed MFP amendment and three different alternatives.

We would appreciate your comments by Friday, January 10, 1986. Questions and comments should be directed to Glenn Freeman, Lewistown District Manager, Airport Road, Lewistown, Montana 59457, telephone 406-538-7461.

Sincerely yours,

Glenn W. Freeman

Glenn W. Freeman
District Manager

2/1/86

Dear Mr. Freeman,

I'm sorry that I was unable to comment on this plan but I am anxious to remain on your mailing list and to be informed of the decision you decided to implement.

Sincerely
Mrs Kathryn (Bellie) Hicks
Yellowstone Valley Audubon Soc.
Rt. 1 Box 232
Joliet Mt.
59041

RESPONSE TO MONTANA DEPARTMENT OF FISH, WILDLIFE & PARKS

1. Elk population figures provided earlier by Montana Dept. of Fish, Wildlife, and Parks (MDFW&P) showed a high of 443 elk for Hunting District No. 631, with a low of 200 head. This is the data we used in the analysis.

   We recognize that large parts of the two allotments are important mule deer habitat. This has been considered throughout the planning and assessment process. MDFW&P 1982-83 data do not match our survey results, and were not mentioned in several previous meetings with MDFW&P biologists.

2. The reason for changing the MFP is to allow for more flexibility to manage the vegetation resource and the livestock operation. The vegetation management we envision will very likely result in more uniform use. Considering the competing interests, we feel that intensive management would result in an optimum balance of resource values, including wildlife habitat (please refer, also, to response No. 64).

   As explained on page 3(II) of the draft, the proposed MFP amendment does not dictate a particular grazing system. However, the AMP to be developed will be constrained by the criteria listed on page 15 & 16, as listed verbatim below:

   1. emphasizing grazing management systems to correct vegetation problems;

   2. providing special management consideration for areas which have a definite potential to support woody riparian vegetation;

   3. minimizing change in traditional elk use patterns in the allotments;

   4. minimizing impacts on wildlife habitat, especially elk and sharp-tailed grouse habitat;

   5. identifying concerns of user groups by meetings with the user groups;

   6. determining interest among the public; and

   7. considering grazing systems that would meet the operator's needs.

   These criteria cannot be met without a grazing system. Due to the present lack of fences and waters over large acreages, a grazing system cannot be implemented without some improvements. The lack of water is acute in that portion of the Craig Coulee Allotment which drains into Larb Creek and Timber Creek. This area totals 40 sections (25,600 acres) and has only six water sources. Because of this, most use of uplands occurs during wet periods when standing water can be found.

   This type of water cannot be depended on for a system that would schedule use during periods other than spring. The few water sources that are in the area are heavily impacted by livestock due to the large numbers of livestock at so few sites.

3. The guidelines used to develop the document were not only allocation of vegetation, but the "Assumption Guidelines and AMP Development Criteria" shown on pages 3, and 15-16, respectively, and explained in the response to comment No. 2. No change in allocation was considered since all available data shows the current allocation provides a good balance for watershed, wildlife, and livestock.

   The original 1962 forage adjudication for wildlife was based on recommendations from MDFW&P at that time. The allotments were reinventoried during the Missouri Break EIS period, and the conclusion was that no adjustments were needed in carrying capacity or allocation of forage. The range survey showed 804 AUMs of vegetation which were not allocated in the Carpenter Creek Allotment, and here are 1600 AUMs of unallocated vegetation in the Craig Coulee Allotment. These AUMs are in addition to the basic allocation of 60% of the total vegetation for wildlife, watershed, and plant maintenance. The method for determining these figures is explained and documented in the Missouri Breaks Grazing EIS (Appendix 1, A2-A9 and Appendix 4, A-41).

   To our knowledge, the forage supply for wildlife has never been questioned on these allotments by MDFW&P or other agencies or individuals. According to MDFW&Ps personnel at Glasgow, the limiting factor for big game species has been and is landowner tolerance to depredation of crops.

   Concerning elk, the MFP (WL-11-2a) states "continue to provide seasonal habitat to meet spring, summer and early fall needs for up to 170 elk in the Harper Ridge herd (combined with the Pines herd to total 250 elk for the planning unit)." The 170 head may be too low today based on current populations. We would consider increasing through the planning process this allocation of 512 AUMs in response to a demonstrated need and clearly defined management plan for the Breaks elk by Montana Dept. of FW&P.

4. Part of the reason for the present condition of the wildlife habitat is how the pre-1983 operators managed their livestock. The movement and control of livestock was handled in a non-intensive manner which included a slow trailing operation from the winter grazing area to the summer area. The present operator handles his livestock much more intensively under approximately the same license. He concentrates his livestock and moves them to fresh grass by riding and using supplements.

   The pre-1983 grazing license and MFP decision do not address and should not address how the operator manages his livestock. The operator before 1983 could have managed his livestock the same way that the current operator is managing them, under the same grazing license. The BLM has little control over how the livestock are managed when the only constraining factors are grazing season and livestock numbers on the grazing license. A grazing system developed in cooperation with the operator would provide more control by BLM on how the livestock are managed. This would prevent deterioration of the existing good wildlife habitat and could enhance other habitat areas.

The range improvements and grazing system proposed in the Missouri Breaks EIS were identified before 1983 and could have been implemented even if the allotments were managed by the previous operators. No grazing system was proposed on the Carpenter Creek Allotment, but the range improvements could have been built and the operators could have managed their livestock to achieve the same objectives as a grazing system. The BLM would be foregoing an opportunity to protect the existing good wildlife habitat and improve other habitat areas by not developing a planned grazing system which considers these factors.

5. The intent of this document was not to "fully address" range improvements. The individual developments will be reviewed on the ground by a BLM wildlife biologist as directed by the Missouri Breaks Grazing EIS (1979). In addition to the environmental analysis of the overall allotment management plan, an environmental analysis will be prepared for each project, and "the benefits of water development for better livestock distribution will be carefully weighed against the effect of such development on important wildlife habitat." (Missouri Breaks Rangeland Management Program, 1979)

   It is our belief that the benefits to vegetation of deferred or rest-rotation grazing and the reduction in erosion and overgrazing impacts around existing scarce waters outweigh the potential impact to wildlife, especially with the wildlife review procedures that are followed. The Bureau philosophy is similar on the issue to that expressed below by Dr. John E. Vallentine in the 1971 text "Range Development and Improvements":

   > "The location of water developments on rangeland is important in controlling the movement, distribution, and concentration of livestock. Improper distribution of grazing frequently results from improper distribution of watering places. Cattle will graze an area close to water again and again rather than travel long distances to better forage. The results in deterioration of forage resources near the water supply and wastes forage at long distances from water. The excessive travel associated with this inefficient harvesting of forage is harmful to the grazing animals and to the rangeland as well."

   As concluded in the Missouri Breaks EIS, erosion around new water developments would be outweighed by the reduction in trailing, trampling and grazing around existing waters (p. 5-1). For example, in the 40 sections on the west side of the Craig Coulee Allotment that have only six waters, 13-17 additional waters are proposed. The additional use at these new sites will reduce use at the six existing sites and would serve to reduce use in the better-watered eastern portion of the allotment as well. If 15 waters are eventually constructed in this area the density of water sources would still be quite low, about one source for every two sections or half the recommended density for optimum livestock distribution. The effect of new concentrations of livestock around the new water sources would be mitigated by requiring a grazing system that maintains the present good range condition in these areas.

6. We agree that the spring and early summer are critical periods relative to elk/cattle interactions. The existing MFP and grazing license allow all of the crucial elk habitat to be grazed by livestock during the spring and early summer period. Livestock can be anywhere within the Carpenter Creek Allotment until July 15. The normal season of livestock grazing in the Frenchman Hills (Craig Coulee Allotment) area begins 5/1 every year. The proposed MFP amendment would require growing season deferment on at least one pasture in each allotment. This deferment would provide a livestock free pasture during the growing season.

   The reference to "three of four pastures being grazed in the critical period" apparently refers to the deferred rotation system (Alternative 3 of Part II of the MFP Amendment document). Under this alternative, the Frenchman Hills, Upper Square Creek, South Fork Willow, Sutherland, Barth Ridge, and Plum Creek pastures would contain the critical habitat. Five of these six pastures would be grazed "before or during the critical period." Under the current situation all six areas (Barth Ridge, Plum Creek, and Frenchmen Hills are not presently fenced as pastures) are grazed before or during the critical period. With this alternative, livestock would only be allowed in one pasture at a time, allowing wildlife exclusive use of the remaining pastures for a portion of the grazing season. At the present time livestock can be in all the pastures at one time which appears more likely to result in elk/cattle social intolerance.

   Alternative two of Part II, the rest-rotation system, provides two livestock-free pastures in the Carpenter Creek Allotment during the spring and early summer period every year. The same applies to the Craig Coulee Allotment.

   The "No Action" Alternative in Part II provides no ungrazed pastures in the spring in the Carpenter Creek Allotment. In Craig Coulee, the critical elk habitat would be free from livestock grazing 2 out of 3 years during the spring and early summer.

   The pre-1983 operation did not provide any ungrazed pastures of critical elk habitat during the spring and early summer period in either allotment.

   These grazing systems are merely examples of the kind of grazing system that might be incorporated when the allotment management plan is developed.

7. Mule deer needs have been considered with those of sharp-tailed grouse, elk and other wildlife in our analysis. We are not intending to emphasize the management of one species at the expense of another. The possibility of mule deer being adversely impacted by cattle, elk or some other resource management-related factor exists. It may have occurred during the pre-1983 system, and it may be occurring now, but deer densities have not indicated such impacts to date.

   In the deferred-rotation alternative, we feel that the probability of deer being negatively impacted by elk and/or cattle is the lowest of the three alternatives we addressed in Part II. In fact, our analysis indicates that Alternatives 1, 2, or 3 would each provide more livestock-free pastures than the pre-1983 operation.

8. The Missouri Breaks Grazing EIS concluded that "at least local reductions in sharp-tailed grouse populations are likely because of this bird's apparent inability to take advantage of temporary increases in residual vegetation produced through rest and deferred rotation grazing" (page 3-21). This conclusion was also reached in the Carpenter Creek-Craig Coulee draft environmental analysis; Alternatives 1 and 2 in Part II, which involve rest-rotation grazing, would result in a slight decline in sharp-tailed populations while populations are expected to be static with Alternative 3, deferred rotation. Static populations are predicted with Alternative 3 because no increase in livestock grazing (AUMs) is planned, and there would continue to be abundant permanent residual vegetation with deferred rotation. Also, since careful review of each water development is planned, minimal impact to valuable sharp-tailed habitat is expected. The Valley Resource Area Wildlife Biologist has intensively inventoried grouse leks in the allotments. This inventory, plus on-the-ground review of the habitat surrounding proposed water developments, will be the basis for the biologist's recommendation on each site. It must be pointed out that there are very extensive areas without water so there is considerable flexibility as to locations,and any grazing system implemented would be designed to maintain the present good range condition in these areas.

9. The 1978 MFP did not restrict changes in class of livestock (cow/calf to yearlings) so this issue is really not relevant to the MFP revision question.

   Yearlings do travel more and farther which could cause more social interaction, although with yearlings the total number of animals grazing is reduced. An animal-unit month (AUM) is based on the amount of forage consumed by such a cow-calf pair in a month. For any yearling use which may be authorized, we would use a conservative conversion rate, e.g. 1 yearling = 0.75 cow-calf pair. In other words, 4 yearlings (4 animals) would be allowed to replace 3 cow-calf pairs (6 animals), resulting in one-third fewer total grazing animals. More significant, however, is the fact that yearlings spend more time up, out of the draws which provide valuable habitat for elk and sharp-tailed grouse, and watershed protection.

10. Alternative 3 of Part II is erroneously referred to in the table of contents as the Preferred Alternative. This has been changed in the final. The range condition (% of potential) figure for the table on page 39 should read "increase (70-80%)" for alternative 3. The benefit-cost ratios shown on page 10 depict the range for all alternatives. The same figures are shown on page 39,0.9/1 and 1.1/1. The cost benefit for the "No Action" Alternative is 0.6/1.

11. These two allotments contain some of the highest wildlife and recreation values in the Valley Resource Area. The sheer size of the allotments and the values they encompass for livestock production, watershed protection and wildlife/recreation make Carpenter Creek and Craig Coulee Allotments prime candidates for improved grazing management. We are proposing to

change management to something we believe will be as good as or better, not worse, for all the values represented. We want to maintain the satisfactory conditions and improve the unsatisfactory conditions. The 80-97 percent good or excellent figure is an incomplete picture of the resource conditions. There are over 21,000 acres of fair condition range in the two allotments, mostly in drainage bottoms and riparian areas. The riparian areas can only be expected to decline under current season-long grazing.

Other factors pointing to a change in management are (1) previous planning in the Missouri Breaks EIS and the Valley MFP which mandate the planned improvements, (2) the needs to the new operator, (3) the constraint the MFP places on the private lands in Carpenter Creek Allotment. Private and state leased lands produce about 60% of the AUMs in the Square Creek area. The Square Creek area is most directly impacted by the MFP restrictions, and (4) it is a fact that the pre-1982 conditions that are deemed so desirable could not be completely reinstituted in that the intensive livestock management practiced by Page-Whitham is within the operator's perogative. These practices (actively herding livestock) are desirable from the vegetation management standpoint.

Response to Page-Whitham Land & Cattle

12. The proposed MFP amendment does not specify the type of management plan except that, as a minimum, growing season deferment be included in the grazing system. Alternatives 2 and 3 of Part II are examples of systems that could meet the multiple-use goals and objectives outlined in the MFP. We agree with your statements concerning the benefits of grazing systems, as stated in the 1978 Missouri Breaks EIS;

"Even with moderate stocking by livestock and the construction of rangeland improvement projects, continued improvement on much of the native rangelands is restrained by inadequate livestock distribution and season-long use made by livestock year after year. However, natural maintenance and improvement of the range can be accomplished by timely resting of the range from livestock use, in much the same manner as buffalo once grazed the Plains. Thus, rangeland improvement can be accomplished through the implementation of grazing systems which include such rest through the distribution and control of livestock." (Pg. 2 Missouri Breaks Rangeland Management Program)

13. This fact is pointed out in response No. 6.

14. The unsatisfactory range condition and overgrazed plants in the allotment usually occur in the lower end of the coulee bottoms where some of the key wildlife habitat is located. The possible alternatives portrayed in the document point out examples of what can be done to improve these areas. Please refer to responses No. 3 and No. 6.

15. Private land does make up 40% of the crucial elk habitat in the Carpenter Creek Allotment and contributes other values for wildlife habitat, including much of the water supply and much of the best shrub and tree cover.

Response to Steve Schindler

16. Appendix 6 shows only the change in values resulting from the three alternatives in Part II. The zero "0" rating means that there would be no change to the current high recreational benefits with the deferred rotation system (Alt. 3). The other two alternatives would reduce recreational benefits. Please refer to the summary of MDFW&Ps hunter days on page 27 of the draft document which shows that there are a total of 2345 hunter days of recreation derived from the area.

17. BLMs mandate for multiple-use began with the Taylor Grazing Act of 1934. This law required wildlife representation on grazing advisory boards. Multiple use is a hard-to-define principle, and means different things to different people. The definition as stated in the Federal Land Management and Policy Act of 1976 is as follows:

> 90 STAT. 2746(c) The term "multiple-use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and non-renewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.

18. The proposed MFP amendment would maintain current satisfactory habitat conditions. Some riparian bottoms (as opposed to the heads of riparian coulees) and other areas heavily grazed by livestock would be improved, which would benefit wildlife. Elk population is managed by MDFW&P, and the limiting factor has been tolerance of private landowners to elk depredation of croplands. The present habitat and forage supply would likely accommodate an increased elk population and would continue to be under the proposed MFP revision. Please refer to response No. 3.

19. Allocation of AUMs to livestock would not increase in any alternative. Utilization (meaning the percent of the current year's growth of forage grazed by livestock or wildlife) would vary from 20-65% in the proposed

action depending on location relative to water, slope and the type of grazing system. Current utilization ranges from 0-80% since there are so few water sources now, large areas are virtually ungrazed while local areas near water are overgrazed.

20. Please refer to response No. 5.

21. The fences referred to are mostly on private and state leased lands (9 miles private and state, 3 miles BLM). We have not been informed by MDFW&P of a problem due to these fences. The existing fences have never been known to cause a problem.

22. Please refer to responses No. 4 and No. 6.

23. Grouse populations have declined throughout eastern Montana the past few years due to drought.

24. There is a definite question as to the maximum number or carrying capacity of this elk habitat (refer to No. 1). This demonstrates a real need to establish the elk carrying-capacity in south Valley County. The number of elk that the habitat will biologically support and the number that security (topography, vegetation, etc.) levels will support must be determined. Until then the elk population desired by sportsmen and the population that could be tolerated by landowners, cannot be logically identified. This demonstrates the need for a comprehensive plan for elk management in the Missouri Breaks with clear and definite goals. We agree that the habitat could support more elk, but as Mr. Schlinder stated, landowner tolerance is the limiting factor.

    Lure crops may be a valuable tool for elk management. We are interested in exploring the idea further. Please refer also to responses No. 3 and No. 17.

Response to Andy Hicks

25. Please refer to response No. 6.

26. Please refer to response No. 3.

27. It must be remembered that we are considering a vast area that has few developments at present. The total costs for range improvements ranges from $201,000 to $243,500, and the benefit-cost ratios range from 0.6/1 to 1.1/1. The Federal Land Management and Policy Act of 1976 directs that 50% of the grazing fee be used for on-the-ground range rehabilitation, protection and improvements. These improvements include, but are not limited to, seeding and reseeding, fence construction, weed control, water development, and fish and wildlife habitat enhancement.

    For the details and values used to derive the benefit-cost ratio see pg. A23 in Carpenter Creek-Craig Coulee analysis.

Response to Charles M. Russell NWR

28. The CMR is not included in any way except to explain the potential grazing system.

Response to Missouri Breaks Bowhunters Association

29. The MFP was signed in 1978 and provided guidance to implement a rest-rotation system on Craig Coulee and to leave Carpenter Creek as a season and numbers allotment with no "grazing system". The associated range improvements would be built to implement these systems. (See No Action Alternative.)

See responses No. 2, No. 4, No. 6, and No. 11 to answer why we are proposing to change the MFP. See also response No. 17 which explains "multiple-use".

30. The subtle changes you refer to are discussed in No. 7 concerning the management of livestock. Under the existing MFP we have no control of how the livestock are managed. Winter livestock numbers have declined since Page-Whitham has taken over the operation. We have not been officially informed of the loss of elk or what the cause is for this alleged decline in elk numbers.

The population dynamics, habits and behavior of the South Valley elk herd (or herds) is not clearly understood. There are several possible responses to the stated elk loss.

MDFW&P feels, and we concur, that intense hunting pressure occurs in this area of limited security cover during bow season. For several years pursuit by bowhunters has been cited as causing elk to leave the South Valley area. Reports by Fish, Wildlife and Parks personnel and BLM of elk movement have ranged from just outside Hunting Districts 631 and 632, to the south side of the Missouri River, North Valley, Canada and North Dakota. This deals only with animals that have left elk habitat and South Valley, not those that have moved from Valley County to some other portion of the Breaks. Even this year there were reports of bowhunters causing 50-75 head to swim Fort Peck Lake to the south side. Besides physical movement, there are questions about other hunter-induced impacts such as wounding loss and poor reproduction due to disturbance during the breeding season.

According to unofficial preliminary reports the number of elk supposedly missing is about 75. Minor shifts by elk out of normal habitat areas could result in their being missed during survey. We will have to await future surveys to establish if these elk are truly gone.

Elk herd management is another consideration. Throughout the 1980s gun permits have fluctuated widely, often doubling or halving in consecutive years. Some past quotas have obviously been set with the aim of herd reduction, probably to reduce depredation problems. It would not be unreasonable to suppose that we are still seeing some residual effect of those heavy harvest years.

Opening "the Triangle", the former refuge formed by the Ridge, Willow Creek, and Northfork Willow Creek roads, was an impact to the elk. Whether it was good or bad for the herd is open to debate.

Finally, years of drought, the worst since the 1930s, is another influence on the elk that should not be discounted. Certainly elk are mobile enough to find the best forage conditions available under drought and probably fare better than many other species. However, having to move farther for food and water would place at least some additional stress on the elk.

The changes in cattle management on the allotments to date may have impacted elk, but there is no clear evidence of it. The preceding factors are but a few, in addition to grazing management, that could affect the elk.

Considering the many possible variables when dealing with the Breaks elk, it would seem presumptuous to attribute half of the alleged loss to the livestock operation. Future monitoring and elk survey may clarify the situation and the possible causes. We must stress again that the MFP revision is not changing resource objectives including maintenance of elk habitat and populations. The MFP change would give BLM much more flexibility to manage livestock use of the allotments to meet these objectives.

31. Please refer to responses No. 5, No. 7, and No. 8.

32. Livestock use on riparian areas would decrease if either Alternative 2 or 3 outlined in the amendment were implemented. The elk would have exclusive use of one of the critical pastures during the spring every year. The "No Action" Alternative would have spring and early summer use in all the critical habitat. Please refer to responses No. 6 and No. 3. Our analysis, and information gathered from MDFW&P, did not show increased depredation caused by the possible grazing systems outlined in the document as explained in responses No. 7 and No. 3. Vegetative production and species diversity should increase with a grazing system. The affects of the outlined grazing systems on sharp-tail is discussed in response No. 8.

33. The outlined grazing systems under the proposed amendment would improve antelope habitat with no effect on sage grouse habitat according to our analysis (Please refer to pg. 32 and 35 in the Carpenter Creek-Craig Coulee Analysis.)

34. As shown on page 39, there would be a slight loss of hunter days with the "No Action" Alternative (Alt. 1) and the "rest-rotation" (Alt. 2). The "deferred rotation" (Alt. 3), would maintain existing recreation benefits. It must be stressed that the three alternative grazing systems addressed are but a few of many alternatives possible under the proposed MFP revision. Recreational use is a key objective which would be addressed in design or revision of grazing systems. Please refer to response No. 16 concerning the economic benefits of recreation.

35. We agree that wildlife has a great economic value to the people of the United States. Access to some of these areas of public land could be limited by private landowners. The proposed amendment would allow us the flexibility to meet our goals with grazing management while allowing the operator to make a living with livestock as opposed to fee hunting.

36. There are approximately 1.2 million preference AUMs on BLM administered lands in Montana. The BLM in Montana received approximately $1,620,000 in grazing receipts in 1984. The grazing receipts for 1985 are not tabulated. Half of the grazing receipts are returned to the BLM District where they were derived to be used for range improvements. Please refer to response No. 27.

Response to Raymond M. Stalmaster, MDPC

37. The purpose of the proposed MFP revisions is explained in response No. 2.

38. BLM-administered public lands adjacent to CMR are managed under the same laws and principles as other BLM-administered lands in Montana. Please refer to response No. 3 which addresses the allocation of forage to livestock and wildlife in the subject allotments.

39. A similar level of development in the allotments was scheduled via the Missouri Breaks Grazing EIS (1978) to occur in the allotments prior to Page-Whitham's application for a change in use of the allotments. This is addressed in the "No Action" Alternative. Please refer to responses No. 3 and No. 4.

Response to Professional Bowhunters Society

40. Please refer to response No. 5.

41. Please refer to responses No. 18 and No. 24.

42. Please refer to responses No. 3 and No. 16.

Response to Lynn E. Goertz

43. The subject area is in MDFW&Ps Regions 6, Hunting District 631.

44. Please refer to response No. 2.

45. Please refer to response No. 27.

Response to Randy Cook

46. Please refer to responses No. 5, No. 6, No. 7, and No. 8.

47. Please refer to response No. 3.

Response to Emit Northup

48. Please refer to responses No. 3, No. 17, and No. 24.

49. Since so much of the existing habitat is already in good or excellent condition, we could only reasonably expect to maintain in that situation, although there is room for improvement in both.

    Refer to comment 2.

    Our intent is to generate an MFP that will among other things adequately protect and, where the potential exists, improve elk and other wildlife habitat. Rather than rewording the MFP so it specifically does not conflict with a specific grazing system, we feel that if the MFP is based on resource values and needs, it will allow for a variety of sound grazing systems designed to meet and fulfill these values and needs. Please refer to response No. 2 for information on objectives.

50. Conception rates would increase because of fencing the cattle into smaller pastures. While management of the herd is the biggest factor, normally, huge pastures such as exist at present result in poor distribution of the bulls which, in turn, results in poor conception rates.

51. We agree that the importance of monitoring cannot be over emphasized. The existing studies and proposed studies by allotment are as follows:

Study Area	No. of Studies	Monitoring Method
Elk habitat	3	Daubenmire, photo point
Antelope habitat	6	Daubenmire, range condition, line intercept, Cole
Sharp-tail habitat	4	Photo point, riparian transect
Mule Deer habitat	2	Daubenmire, Cole
Sage grouse habitat	6	Daubenmire, range condition, line intercept
Waterfowl habitat	1	Photo point
Riparian areas	3	Riparian transect, photo point
Range Condition	10	3x3, photo point, condition mapping
Livestock weight gains	1	Records from operator

The monitoring data will be evaluated on a predetermined schedule to determine to what extent management objectives are being met. Progress of the AMP will be documented annually in an AMP narrative. These monitoring studies are placed on key areas and range sites which presently meet or have the potential to meet the objectives. During AMP analysis and evaluations, all factors relating to the success of meeting the objectives will be considered including, but not limited to; actual livestock use, climate, (including the Fort Peck and Corral Coulee weather stations), trend plot studies, utilization, livestock production, grazing management, and wildlife use.

The monitoring is needed to ensure that we are meeting the goals of the AMP and land use plan and allow us the flexibility to change the AMP to meet the goals in the MFP. If the plan is not moving us towards those goals as shown by the studies, it can be revised to do so.

52. Please refer to response No. 8.

53. The custodial permit will be closely monitored for resource impacts.

54. Please refer to response No. 10. The stocking level will be the same under the three alternatives evaluated.

Response to Stan Celmer

55. Please refer to response No. 27.

56. Please refer to response No. 2.

Response to Stephen P. Berberet, MD

57. Please refer to response No. 27.

Response to Jack Spicer

58. Please refer to responses No. 2 and No. 4.

59. Please refer to responses No. 2 through No. 8, No. 11, and No. 14.

Response to NWF

60. Please refer to the introductory information and response No. 2 which address the purpose of the documents for clarification.

61. The "No Action" Alternative as addressed in this document includes greater numbers of water developments, etc. than do Alternatives 1 or 2. Our analysis showed that the "No Action" Alternative would be the worst for wildlife due to lack of growing season deferment in the Carpenter Creek Allotment and increased elk-livestock social intolerance. Please refer to response No. 4 for more details.

62. We will not comment on the validity of Valley MFP. This question is currently in litigation.

63. Livestock allocation would remain the same. The season of use on the two allotments is yearlong. The MFP revision would allow for increased summer use in the Carpenter Creek Allotment but would require, as a minimum, growing season deferment in the grazing formula. The improvements are proposed to support better grazing management and provide for maintenance and improvement of the vegetation. Total grazing use would not increase.

64. We fully understand and appreciate the value of "edge effect" to wildlife. We see the greatest value being derived from ecotones between adjacent plant communities such as grass/forbs vs. shrubs, shrubs vs. trees.

A multiple-use agency such as ours strives for the degree of "edge effect" which provides an optimum balance for a number of resources, including watershed cover, wildlife habitat, livestock forage, and visual aesthetics. That balance does not include the artificial "edge effect" created between an overgrazed grass community and one which is not grazed or only lightly utilized.

With more intensive management, as opposed to merely more intensive grazing, we will reduce the sharp utilization contrasts in grass communities. This will undoubtedly reduce the optimum level of "edge effect" for some ground-nesting birds. We are willing to risk that, however, because of other benefits listed below.

Much of the livestock carrying capacity assigned to Carpenter Creek and Craig Coulee Allotments includes the acreage which has been ungrazed or lightly grazed by livestock in recent years. This fact has created two intolerable situations: 1) other areas take up the slack and are, therefore, significantly overgrazed by the combination of livestock and elk, and 2) the ungrazed areas are stagnant in the sense that old vegetation is not being removed by grazing or fire. This phenomenon, in addition to the lack of periodic trampling by livestock, holds down the vigor and production potential of those grasslands.

Conversely, periodic and properly-timed livestock grazing of the uplands will put standing litter on the ground, stimulate new grass growth, trample grass seeds into the ground, and loosen the crusted surface soil. These impacts will result in more ground cover for watershed, better moisture penetration into the soil, and a greater quality and quantity of grasses, forbs, and shrubs.

These same intensive management principles and potential benefits also apply to overgrazed sites. The water cycle, nutrient cycle, vegetative diversity, vigor, and production will be improved by: intermittent rather than continuous grazing, timing for plant phenology and the retention of seed trampling and soil surface preparation.

65. Please refer to responses No. 5 through No. 8. Responses No. 5, No. 7, and No. 8 address impacts of range improvements, response No. addresses the elk/cattle intolerance issue.

66. Please refer to response No. 3. We are considering an MFP amendment that would allow a range of management opportunities outlined in Part II of the document.

67. In the Table of Contents, Alternative 3 of Part II was inadvertently identified as the "Proposed Alternative". This has been corrected. The best alternative for wildlife is Alternative 3 (the deferred system).

This is the system we plan to implement but do not want to tie a specific grazing plan to the MFP revision. The development of an AMP and analysis of impacts will be finalized after the decision to amend the MFP has been finalized. Please refer to response No. 6 for details of use periods.

68. Please refer to response No. 7.

69. Wildlife values and impacts are described on pages 10, 11, 28, 29, 30, 32, 35, 38, and 39 of the draft document. The conclusions reached are consistent with the 1978 Missouri Breaks Grazing EIS and explained in more detail in responses 3, 4, 5, 6, 7, and 8.

70. No additional grazing is proposed; AUM allocations to livestock would not increase. Water developments and deferred or rest-rotation grazing would result in light-moderate use of some areas presently ungrazed. It is our belief that scheduled rest and deferment with light to moderate grazing will provide some benefit to the vegetation on the ungrazed areas as well as even greater benefit to the areas that are now heavily grazed. Please refer to responses No. 3 through No. 8, No. 11, No. 12, and No. 64.

71. Please refer to responses No. 2 through No. 8.

Response to Montana Bowhunters Association

72. Please refer to response No. 17 and No. 34.

73. Please refer to response No. 6, No. 24, and No. 30.

74. By law, half of the grazing fees are returned to the BLM District where they were derived for range improvement (please refer to responses No. 27 and No. 36).

The proposal is to change the land use plan to allow BLM the flexibility to meet the goals of the MFP by implementing a grazing system. The "No Action" Alternative also proposes spending money for range improvements (fence, waters, cattle guards).

Response to Lee Parks

75. The portions of the allotments we are analyzing are not part of a wildlife refuge (see responses No. 17 and No. 28).

76. Please refer to response No. 2.

Response to Wittmayer and Silver Dollar Grazing Associations

77. Please refer to response No. 12.

Response to Hinsdale Livestock Company

78. Please refer to responses No. 12 and No. 17.

Response to Badland Co-op State Grazing District

79. Please refer to responses No. 12 and No. 17.

Response to Mitch Etchart

80. Please refer to responses No. 12 and No. 17.

Response to C. D. Mackle

81. Please refer to responses No. 12 and No. 17.

82. Please refer to responses No. 12 and No. 17.